

**Federal Defenders  
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March 2, 2020

**VIA ECF**

Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: United States v. Hammatt, et al.  
19 Cr. 067 (PGG)**

Dear Judge Gardephe:

I write, on behalf of Joseph Hoats, to request an adjournment of the pretrial conference currently scheduled in the above referenced matter for March 12, 2020. The Government and counsel for Christopher Hammatt, Susan Hammatt, and Edwin Tanglao consent to this request.

I am counsel in the matter of *United States v. Peter Bright*, 19 Cr. 521 (PKC), that is scheduled for re-trial on March 10, 2020, following a mistrial declared on February 19, 2020. As such, I will be unavailable to appear at the scheduled pretrial conference for Mr. Hoats. I respectfully request an adjournment to a date in mid-April that is convenient with the Court.<sup>1</sup>

All defendants consent to the exclusion of time pursuant to the Speedy Trial Act.

Respectfully submitted,

/s/ Amy Gallicchio

Amy Gallicchio, Esq.  
Assistant Federal Defender  
(212) 417-8728

CC: AUSA's Nicholas Chiuchiolo and Jun Xiang  
Donald Duboulay, Esq.  
Judith Vargas, Esq.  
Mark DeMarco, Esq.

<sup>1</sup> For scheduling purposes, I advise the Court that I will be unavailable from March 27, 2020 through and including April 7 2020.

**MEMO ENDORSED**

*The parties are directed to submit a status letter by March 5, 2020 explaining the status of discovery, pretrial motions, and the likelihood of a pretrial disposition.*

**SO ORDERED:**

*Paul R. Senft*

**Paul R. Senft, U.S.D.J.**

*March 3, 2020*